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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10  
11 **IN RE: UBER TECHNOLOGIES, INC.,**  
12 **PASSENGER SEXUAL ASSAULT**  
13 **LITIGATION**

No. 3:23-md-03084-CRB

14 **STIPULATION AND [PROPOSED]**  
**ORDER REGARDING PAGE LIMITS FOR**  
**PLAINTIFFS' OPPOSITION TO**  
**DEFENDANTS' MOTIONS TO DISMISS**  
**THE LONG-FORM MASTER**  
**COMPLAINT**

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16 This Document Relates to:  
17 ALL ACTIONS

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

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## **STIPULATION**

**WHEREAS**, on March 25, 2024, the Court ordered that Defendants be granted up to 30 pages for each of its five initial Rule 12 Motions, and that Plaintiffs be granted up to 30 pages for any opposition to any of those Motions, and that Defendants be granted up to 15 pages for each of its replies in support of its Rule 12 Motions. ECF 358.

**WHEREAS**, on April 1, 2024, Defendants filed five 30-page motions to dismiss the Master Long-Form Complaint, totaling 150 pages. ECF 384, 385, 386, 387, 388.

**WHEREAS**, on April 4, 2024, the Court accelerated Plaintiffs' deadline to respond to Defendants' motions from May 22 to April 30. ECF 397.

**WHEREAS**, Plaintiffs desire to file a single omnibus opposition in response to the five motions, rather than five separate oppositions.

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

Plaintiffs may file a single omnibus opposition, up to 150 pages, to Defendants' five motions to dismiss the master long-form complaint; and

Defendants may file up to five reply briefs, totaling up to 75 pages, in support of Defendants' five motions to dismiss. Defendants may elect to divide the 75 pages among the five reply briefs in any amount provided that the reply briefs do not exceed 75 pages.<sup>1</sup>

## **IT IS SO STIPULATED.**

<sup>1</sup> Defendants also may file a single reply brief of up to 15 pages in support of their motion to dismiss the *K.P.* action.

1 Dated: April 16, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

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2 Dated: April 16, 2024

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4 By: /Robert Atkins  
5 Robert Atkins

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LLC

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2                   **CERTIFICATE OF SERVICE**  
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4                   I hereby certify that on April 16, 2024, I electronically filed the foregoing document with  
5 the Clerk of the Court using the CM/ECF system, which will automatically send notification of  
6 the filing to all counsel of record.  
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2                   UNITED STATES DISTRICT COURT  
3                   NORTHERN DISTRICT OF CALIFORNIA  
4                   SAN FRANCISCO DIVISION  
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6                   **IN RE: UBER TECHNOLOGIES, INC.,  
7 PASSENGER SEXUAL ASSAULT  
8 LITIGATION**

No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
STIPULATION REGARDING  
EXPEDITED LETTER BRIEFING ON  
PRODUCTION OF DOCUMENTS FROM  
OTHER SEXUAL ASSAULT CASES  
UNDER PTO NO. 5**

11 This Document Relates to:  
12                   **ALL ACTIONS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

14                   The Court hereby GRANTS the parties' stipulation as follows:  
15                   Plaintiffs may file a single omnibus opposition, up to 150 pages, to Defendants' five  
16 motions to dismiss the master long-form complaint and Defendants may file up to five reply  
17 briefs, totaling up to 75 pages, in support of Defendants' five motions to dismiss. Defendants may  
18 elect to divide the 75 pages among the five reply briefs in any amount provided that the reply  
19 briefs do not exceed 75 pages.  
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21                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Date: April 17, 2024



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25                   HON. CHARLES R. BREYER  
26                   UNITED STATES DISTRICT JUDGE  
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